

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re: Jeffery Cates and Christine Cici-Cates

Bky File No. 21- 40882 (Chapter 11)

Debtors

**APPLICATION OF SAPIENTIA LAW GROUP FOR ALLOWANCE AND PAYMENT
OF COMPENSATION AND FOR REIMBURSEMENT OF EXPENSES ON A FINAL
BASIS**

TO: ALL PARTIES IN INTEREST

Sapientia Law Group (“Applicant”), hereby submits this application for services, rendered as counsel of the bankruptcy estate of Debtor, herein moves the Court for the relief requested below and gives notice of hearing.

1. **The Court will hold a hearing on this motion at 9:30 a.m. on Tuesday, May 2, 2023.** The hearing will be conducted telephonically. Please dial 1-888-684-8852 to call in for the hearing. When prompted, enter access code: 5988550. When prompted, enter security code: 0428. Any person wanting to appear in person must contact Judge Fisher’s Courtroom Deputy at 651-848-1061 at least 48 hours prior to the hearing.

**THE HEARING MAY BE CONTINUED BY THE COURT AT THE TIME OF
THE HEARING WITHOUT ADDITIONAL NOTICE.**

1. Pursuant to Rule 9006(a) of the Bankruptcy Rules of Procedure and Local Rule 9006-1(c), any response to this motion must be filed and delivered or mailed not later than **Thursday, April 27, 2023**, which is five days before the time set for the hearing (including Saturdays, Sundays and holidays.)

UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION WITHOUT A HEARING.

2. This Court has jurisdiction over this motion under 28 U.S.C. §§ 157 and 1334, Bankruptcy Rule 5005 and Local Rule 1070-1. Venue of this case and the Motion are proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

3. This proceeding is a core proceeding. The petition commencing this case was filed on May 17, 2021 (the “Petition Date”). This case is now pending before this Court.

4. The Debtor’s Fifth Modified Plan of Reorganization (“Plan”) was confirmed on February 14, 2022 [Docket ECF 275]. The Plan provides for the sale of some or all of the Debtors’ real property. No such sales have taken place.

5. The Plan provides that until the terms of the plan are fulfilled, professionals must make applications for post-confirmation fees and expenses. Therefore, this application is appropriate under the Plan and the Court’s Confirmation Order.

6. This is an application, made pursuant to Sections 328, 330 and 331 of the Bankruptcy Code, for allowance for compensation for legal services rendered by Applicant on behalf of the Debtor in Possession during the period extending from February 14, 2023 to March 31, 2023, as a final award under 11 USC § 330.

7. Debtor and Applicant applied for an order approving employment on May 18, 2021 [Docket 5]. Attached to this Application as Exhibit A is a copy of the court’s order dated June 8, 2021 [Docket 21], approving the employment of Applicant as Attorney for the Debtor.

8. The Applicant was awarded fees and costs on July 28, 2021 [Docket 37] in the amount of \$16,906.00. That fee award has been paid.

9. The Applicant was also awarded fees and costs via an order dated September 30,

2021 [Docket 70] in the amount of \$11,150.16. That fee award has been paid.

10. The Applicant was also awarded fees and costs via an order dated December 1, 2021 [Docket 111] in the amount of \$44,918.57. That fee award has been partially paid.

11. The Applicant was also awarded fees and costs via an order dated March 8, 2022 [Docket 151] in the amount of \$34,465.73. That fee award has been not been paid.

12. The Applicant was also awarded fees and costs via an order dated December 13, 2022 [Docket 244] in the amount of \$92,058.82. That fee award has been not been paid.

13. The Applicant was also awarded fees and costs via an order dated March 3, 2023 [Docket 302] in the amount of \$84,441.24. That fee award has been not been paid.

14. No funds are currently being held by your applicant for payment of any awarded fees.

15. Mary Sieling, the Subchapter V Trustee applied for and received various orders for interim fees which have been paid except for the latest fee award of \$8,333.48 approved on March 28, 2023 [ECF 308] which remains unpaid.

16. Special Real Estate Counsel for the Debtor, Johnson, Larsen & Peterson applied for and received an order for interim fees in the amount of \$10,341.00. That amount has not been paid.

17. Tax Preparer Susan Schulzetenberg PA applied for and received a fee award of \$1,800.00 which has been paid.

18. Tax Preparer Casey Mattson applied for and received a fee award of \$500.00 which has been paid.

19. Other than any accrued but as yet unapplied for fees by professionals in the case and the unpaid fee awards described herein, there are no other administrative expenses unpaid as

of the date of this application, exclusive of ordinary course expenses.

20. From February 14, 2023, the date of confirmation of the Debtor's Fifth Modified Plan, through March 31, 2023 Applicant has rendered professional legal services to the Debtor relating to this bankruptcy case, all of which have been reasonable, necessary and conferred benefit to the estate. Such services included, inter alia:

- Applying for fees for counsel for the Debtor
- Finalizing certain issues related to case administration
- Pursuit of an objection to the \$1,300,000 alleged claim of Medina 55.

The professional services for the Debtor were provided in the suggested categories promulgated by the US Trustee as detailed on the Total page on Exhibit B, Attached:

21. Based on the billing detail prepared by Applicant contemporaneously with the performance of services from February 14, 2023 through March 31, 2023, Applicant has expended a total of 231.6 hours of attorney, paralegal and staff time, for total fees in the amount of \$93,727.00. In addition, Applicant has incurred expenses in the amount of \$1,389.80. Attached to this application as Exhibit B are pre-bill invoices itemizing Applicant's expenses and time segregated by task or proceeding for all services rendered during the relevant period.

22. The following hourly rates were charged by each person whose time is included in this application:

<u>Initial</u>	<u>Timekeeper</u>	<u>Bar Admission Date</u>	<u>Agreed Rate</u>	<u>Hours</u>	<u>Total Amount of Billing</u>
AJB	Alexander J. Beeby	10/16	\$350	99.2	\$34,720.00
KCE	Kenneth C. Edstrom	10/83	\$450	127.7	\$57,150.00
THN	Towle H. Neu	05/00	\$450	4.7	\$1,757.00
TOTAL				232.8	\$93,627.00

23. All services for which compensation is requested by Applicant were performed for and on behalf of the Debtor.

24. The total amount of fees sought to be awarded are reasonable and necessary based on the nature, the extent, and the value of such services, the time spent on such services, and the cost of comparable services other than in a case under Title 11. Therefore, Applicant is entitled to an order allowing all fees and costs in this application as final compensation under 11 USC § 330.

25. Applicant has not entered into any agreement, express or implied, with any other party in interest including The Debtor, receiver, trustee or any representative of any of them, or with any attorneys for such party in interest in the proceedings, for the purpose of fixing fees or other compensation to be paid to such party in interest in the proceedings for services rendered or expenses incurred in connection therewith from the assets of the estate in excess of the compensation allowed by law. In addition, Applicant states that the fees ultimately allowed by this Court will not be shared with anyone except that the fees will become part of the general funds of Sapientia Law Group.

WHEREFORE, Applicant respectfully requests (1) allowance of compensation to Sapientia Law Group, in the amount of \$93,627.00 for fees and \$1,389.80 in costs from February 14, 2023 to March 31, 2023 including an order allowing said sums as a final fee award and such other and further relief as the Court deems appropriate.

Dated: April 10, 2023

/s/ Kenneth C. Edstrom
Kenneth C. Edstrom (148696)
Sapientia Law Group
120 South Sixth Street, Suite 100
Minneapolis, MN 55402
612-756-7100
kene@sapientialaw.com
Attorneys for Debtors

VERIFICATION

I, Kenneth Corey-Edstrom, attorney at Sapientia Law Group, the Applicant named in the foregoing Application of Sapientia Law Group, for Allowance and Payment of Compensation and for Reimbursement of Expenses on a Final Basis, declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information, and belief.

Dated: April 10, 2023

/e/ *Kenneth C. Edstrom*

Kenneth C. Edstrom

EXHIBIT A

Order dated June 8, 2021 [Docket 21],
approving the employment of
Applicant as Attorney for the Debtors.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

ORDER APPROVING
EMPLOYMENT OF ATTORNEYS

Jeffrey Cates and Christine
Cici-Cates,

Debtors.

BKY 21-40882

At Minneapolis, Minnesota, June 8, 2021.

Based on the application filed on May 17, 2021, by the
debtors in possession pursuant to 11 U.S.C. § 327(a);

IT IS ORDERED:

1. The employment by the debtors in possession of
Sapientia Law Group, PLLP, to represent the debtors in
possession in carrying out their duties under Title 11 is
approved.

2. Fee applications by Sapientia Law Group, PLLP,
may be heard on 60-day intervals from commencement of the case.

/s/ Kathleen H. Sanberg

UNITED STATES BANKRUPTCY JUDGE

EXHIBIT B

DETAIL OF EXPENSES AND TIME ENTRIES

Category	Attorney	Hours	Amounts	Per Hour
Costs		NA	\$ 1,389.80	
Fees				
Fee Application	KCE	3.10	\$ 1,395.00	\$ 450.00
Case Administration	KCE	0.40	\$ 180.00	\$ 450.00
Claim Administration and Objection	KCE	124.20	\$55,575.00	\$ 447.46
Claim Administration and Objection	AJB	99.20	\$34,720.00	\$ 350.00
Claim Administration and Objection	THN	4.70	\$1,757.00	\$ 350.00
Claim Administration and Objection Total		228.10	\$ 92,052.00	
KCE		127.70	\$ 57,150.00	
AJB		99.20	\$ 34,720.00	
THN		4.70	\$ 1,757.00	
Total Fees		231.6	\$ 93,627.00	
Total Costs			\$ 1,389.80	
Grand Total			\$ 95,016.80	



SAPIENTIA
LAW GROUP

120 South 6th Street, Suite 100 | Minneapolis, MN 55402

Phone: (612) 756-7100 | Fax: (612) 756-7101

Tax Identification: 27-5229368

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PRE-BILL

Prepared for Jeffrey Cates and Christine Cici- Cates

Re: Case Administration (10847.05-B08)

Jeffrey Cates and Christine Cici- Cates
2400 Cates Ranch Drive
Hamel, MN 55340

Invoice Number: Pre-bill
Invoice Date: April 04, 2023
Current Charges: \$180.00
Balance Due: \$113,042.50

SERVICES

3/8/2023	Analysis of issue concerning need for post-confirmation DIP accounts; advise client.	K.C.E.	.40	\$180.00
SUBTOTAL – SERVICES:				0.40 \$180.00

COSTS

SUBTOTAL – COSTS: \$0.00

MATTER LEDGER

12/13/2022	Balance before last invoice	\$83,242.50
3/21/2023	Invoice 17633	\$29,620.00
NEW BALANCE:		\$112,862.50
		0

TRUST ACCOUNT

4/4/2023	Previous Balance	\$0.00
AVAILABLE IN TRUST:		\$0.00

CURRENT CHARGES: \$180.00

PREVIOUS BALANCE DUE: \$112,862.50

BALANCE DUE: \$113,042.50

THANK YOU FOR YOUR BUSINESS!

*We accept the following credit cards: Visa, MasterCard, American Express, Discover & Diner's Club.
Please call (612) 756-7100 to pay by credit card.*

Sapientia Law Group is a women and minority-owned business and has been certified as a minority business enterprise as defined by the National Minority Supplier Development Council and adopted by the Midwest Minority Supplier Development Council. Please contact us for a copy of our certification.



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PRE-BILL

Prepared for Jeffrey Cates and Christine Cici- Cates

Re: Claims Administration and Objections (10847.06-B08)

Jeffrey Cates and Christine Cici- Cates
2400 Cates Ranch Drive
Hamel, MN 55340

Invoice Number: Pre-bill
Invoice Date: April 10, 2023
Current Charges: \$92,052.00
Balance Due: \$151,297.00

SERVICES

2/14/2023	Strategize regarding pretrial filings for Medina 55 claim	A.J.B.	.90	\$315.00
2/14/2023	Telephone conference with T. Wagor regarding pretrial filings for Medina 55 claim	A.J.B.	.10	\$35.00
2/14/2023	Work on draft exhibits stipulation for Medina 55 claim	A.J.B.	3.00	\$1,050.00
2/15/2023	Analysis of damage claims by Medina 55 (1.5); continue to work on documentation for submissions to court for hearing (3.3); review and draft initial response to motion to allow Atkinson to appear remotely (.6); work on pre-trial brief (2.0)	K.C.E.	7.40	\$3,330.00
2/15/2023	Correspond with T. Wagor regarding supplemental production regarding Medina 55 claim	A.J.B.	.30	\$105.00
2/15/2023	Work on draft fact stipulation regarding Medina 55 claim	A.J.B.	3.10	\$1,085.00
2/16/2023	Work on fact stipulations regarding Medina 55 claim	A.J.B.	4.10	\$1,435.00
2/17/2023	Continue to work on pre-hearing filings (2.2); communicate with client re witness preparation (.4); finalize and file response to motion to allow remote appearance (.5); communicate with witnesses re hearing (.4)	K.C.E.	3.50	\$1,575.00
2/17/2023	Complete draft fact stipulations regarding Medina 55 claim and correspond with T. Wagor regarding the same	A.J.B.	4.60	\$1,610.00
2/19/2023	Prepare for evidentiary hearing; analysis of legal issues re real estate value (1.5); continue drafting pre-hearing brief (2.8); work on witness list (1.1); continue to review exhibits (.6); begin witness preparation (.9)	K.C.E.	6.90	\$3,105.00
2/20/2023	Finalize brief (1.1); work on stipulations (3.6) multiple communications with opposing counsel re form of stipulations (.8); file all pre-hearing documents (.5)	K.C.E.	6.00	\$2,700.00

2/20/2023	Analyzed proposed exhibits from Medina 55 regarding claim	A.J.B.	1.00	\$350.00
2/20/2023	Edit draft pretrial brief regarding Medina 55 claim	A.J.B.	3.30	\$1,155.00
2/20/2023	Draft witness list for Medina 55 claim hearing	A.J.B.	.70	\$245.00
2/20/2023	Analyze Medina 55's proposed edits to stipulation of facts regarding Medina 55 claim	A.J.B.	.60	\$210.00
2/20/2023	Telephone conference with T. Wagor regarding pretrial stipulations for Medina 55 claim hearing	A.J.B.	.70	\$245.00
2/20/2023	Finalize fact and exhibit stipulations for Medina 55 claim hearing, incorporating changes discussed with T. Wagor	A.J.B.	.80	\$280.00
2/21/2023	Work on exhibits (.5). Multiple communications with witnesses and opposing counsel concerning possible delay in hearing due to weather (.8); prepare for and attend hearing with Judge Fisher concerning motion to allow remote appearance, notify witnesses and clients (.6); Continue to prepare cross examination of real estate broker for Claimant (1.5)	K.C.E.	3.40	\$1,530.00
2/21/2023	Analyze and prepare exhibits for Medina 55 claim hearing	A.J.B.	4.20	\$1,470.00
2/23/2023	Analysis of claim of Granite re and provide information on other corporate claims to AJB for him to draft objection.	K.C.E.	1.20	\$540.00
2/23/2023	Analyze claims to identify potential objections	A.J.B.	2.50	\$875.00
2/23/2023	Draft correspondence to four of the Company Creditors regarding potential claim objections	A.J.B.	1.00	\$350.00
2/24/2023	Draft correspondence to two Company Creditors regarding potential claim objections; finalize correspondence to all six Company Creditors	A.J.B.	.70	\$245.00
2/27/2023	Review various Granite Re, Inc. claims and amendments; further analysis and development of spreadsheet concerning differences in the claim filed by Granite re and their back up information; communicate with Granite Re concerning fact that their claim seems \$87,500 too high. Receive confirmation that the claim would be amended.	K.C.E.	2.10	\$945.00
2/27/2023	Continue to work on hearing prep for Medina 55 matter. Begin integrating stipulations into outline.	K.C.E.	2.00	\$900.00
2/27/2023	Work on draft omnibus claim objection	A.J.B.	4.20	\$1,470.00
2/28/2023	Finalize omnibus motion objecting to claims (.5); work on witness preparation for trial (.9); multiple communications with opposing counsel about potential omnibus motion excluding Oppidan witnesses and discuss response (1.2)	K.C.E.	2.60	\$1,170.00
2/28/2023	(Medina 55) Review and process Medina 55 trial exhibits and redactions	A.J.B.	.40	\$140.00
2/28/2023	Finish draft omnibus claim objection	A.J.B.	1.00	\$350.00
2/28/2023	(Medina 55) Analyze issues related to Medina 55 correspondence regarding witness	A.J.B.	.50	\$175.00
3/1/2023	Work on responding to objection of Medina 55 to testimony of Oppidan witnesses; file letter with court re possible status conference; notify clients (1.5);	K.C.E.	1.50	\$675.00
3/1/2023	work on getting trial exhibits copied from outside vendor	K.C.E.	.70	No Charge
3/1/2023	Work on Fair Market Value research	K.C.E.	.50	\$225.00
3/2/2023	Telephone conference with client regarding Medina 55 claim strategy	A.J.B.	.50	\$175.00

3/2/2023	Prepare demonstrative for Medina 55 claim objection hearing	A.J.B.	1.70	\$595.00
3/2/2023	Strategize and plan for trial regarding Medina 55 claim	A.J.B.	2.10	\$735.00
3/2/2023	Work on preparation for evidentiary hearing; Analysis of law on liquidated damages (2.2); analysis of issues related to positive relief pleaded in objection that need to be separated out and pleaded as Adversary action (1.8)	K.C.E.	4.00	\$1,800.00
3/2/2023	Prepare for and Conference with clients re options re adversary actions.	K.C.E.	.50	\$225.00
3/3/2023	Work on exhibits (1.2); analysis re damages on contingent contracts (1.5); work on cross examination (1.1)	K.C.E.	3.80	\$1,710.00
3/3/2023	(Medina 55 Claim) Analyze Yanta report and work on cross examination for Yanta	A.J.B.	4.10	\$1,435.00
3/6/2023	Status conference with client; communication with witnesses and court re availability for times for additional witnesses.	K.C.E.	.60	\$270.00
3/6/2023	Obtain hearing date for Omnibus Claim Objection and update and submit draft motion to client for verification	A.J.B.	.40	\$140.00
3/6/2023	Telephone conference with clients regarding Medina 55 claim objection strategy	A.J.B.	.10	\$35.00
3/6/2023	(Medina 55 Claim) Continue analyzing Yanta report and preparing cross examination	A.J.B.	2.20	\$770.00
3/7/2023	Work on objections to claims motion.	K.C.E.	.50	\$225.00
3/7/2023	Correspond with R. Wilcox regarding Architectural Products claim	A.J.B.	.10	\$35.00
3/7/2023	(Medina 55 Claim) Analyze Medina 55 motion in limine	A.J.B.	2.00	\$700.00
3/7/2023	(Medina 55 Claim) Strategize, plan, and frame response to Medina 55 motion in limine	A.J.B.	1.30	\$455.00
3/7/2023	Finalize and file Omnibus Claim Objection	A.J.B.	.30	\$105.00
3/7/2023	Analyze and respond to correspondence from R. Jensen regarding Distinctive Iron claim	A.J.B.	1.40	\$490.00
3/9/2023	Work on demonstrative and trial exhibits; Analysis of need for declaration in connection with response to motion in limine.	K.C.E.	3.10	\$1,395.00
3/9/2023	(Medina 55) Analyze and plan response to Medina 55's expedited motion in limine	A.J.B.	1.20	\$420.00
3/10/2023	(Medina 55) Analyze and draft motion in limine background and start of discussion	A.J.B.	5.20	\$1,820.00
3/10/2023	(Medina 55) Telephone conference with D. Scott regarding declaration in support of response to motion in limine; draft the same	A.J.B.	.90	\$315.00
3/12/2023	(Medina 55) Complete first draft of response to motion in limine, including remainder of discussion section	A.J.B.	3.60	\$1,260.00
3/13/2023	Analysis of responsive brief; legal analysis of issues presented; multiple communications re same.	K.C.E.	2.20	\$990.00
3/13/2023	Review response of Distinctive Iron to our objection to claim; analysis of defenses and attachments to amended proof of claim no. 7; memo to client re possible response to objection.	K.C.E.	1.20	\$540.00
3/13/2023	(Medina 55) edit and finalize response to motion in limine and accompanying documents; submit for client approval and verification	A.J.B.	2.10	\$735.00

3/13/2023	(Medina 55) Plan remaining evidentiary hearing needs and strategize preparations	A.J.B.	1.10	\$385.00
3/14/2023	Analysis of potential other claims that need to be objected to.	K.C.E.	.20	\$90.00
3/14/2023	(General) Assess and strategize remaining claims processing needs and timelines	A.J.B.	.30	\$105.00
3/14/2023	(Medina 55) Begin analysis of Yanta report and preparations for cross examination	A.J.B.	4.50	\$1,575.00
3/15/2023	Prepare for and attend expedited motion on excluding Dave Scott as witness; multiple communications re same.	K.C.E.	1.80	\$810.00
3/15/2023	(Medina 55) Draft outline for motion in limine hearing	A.J.B.	1.10	\$385.00
3/19/2023	Trial Preparation - review Atkinson deposition, work on C-X of Atkinson and Cates direct examination.	K.C.E.	3.50	\$1,575.00
3/20/2023	Witness Prep; multiple communications with opposing counsel and court re appearance of D Scott and R Atkinson.	K.C.E.	6.70	\$3,015.00
3/20/2023	(Medina 55) Conference with J., C., & C. Cates regarding trial preparations	A.J.B.	4.80	\$1,680.00
3/20/2023	(Medina 55) Draft proposed stipulated order regarding motion in limine; correspond with T. Wagor and court regarding the same	A.J.B.	.30	\$105.00
3/20/2023	(Distinctive Iron) Analyze Distinctive Iron claim demand	A.J.B.	.20	\$70.00
3/21/2023	Final preparation for hearing; review all documents in connection with preparation of cross examination of Rose Lorsung (8.0); finalize direct examination of Cates and transmit notes to clients (1.1); conference with client re various questions on testimony (.3); Analyze Janta C-X (.3); prepare all exhibits (1.1)	K.C.E.	10.80	\$4,860.00
3/21/2023	(Medina 55) Prepare for evidentiary hearing, including Yanta cross examination	A.J.B.	5.40	\$1,890.00
3/21/2023	(Medina 55) Analyze and prepare script for potential motion for judgment on partial findings	A.J.B.	1.90	\$665.00
3/21/2023	(Distinctive Iron) Correspond with clients regarding Distinctive Iron claim demand	A.J.B.	.10	\$35.00
3/22/2023	Attend and represent client at evidentiary hearing.	K.C.E.	9.00	\$4,050.00
3/22/2023	Post hearing conference with clients (.5); continue preparation for direct examination of Chris and Jeff Cates (3.0)	K.C.E.	3.50	\$1,575.00
3/22/2023	(Medina 55) evidentiary hearing preparations and strategizing in morning and on breaks	A.J.B.	2.40	\$840.00
3/22/2023	(Medina 55) evidentiary hearing re Medina 55 claim (Day 1): Medina 55 witnesses Lorsung and Yanta; oral motion for judgment on partial findings	A.J.B.	6.10	\$2,135.00
3/22/2023	Transcribe trial audio (day 2) to transcript and analyze/correct transcript accordingly.	T.H.N.	1.20	\$420.00
3/23/2023	Prepare for and attend evidentiary hearing (4.5); analysis of need for transcript and begin collecting information for briefing of all issues (.8)	K.C.E.	5.30	\$2,385.00
3/23/2023	(Medina 55) Evidentiary hearing preparations, strategy, and debrief before hearing, during recess, and immediately after hearing	A.J.B.	1.30	\$455.00

3/23/2023	(Medina 55) Evidentiary hearing regarding Medina 55 claim (Day 2): Debtor witnesses C. Cates and J. Cates	A.J.B.	2.40	\$840.00
3/23/2023	(Medina 55) Travel from evidentiary hearing to office	A.J.B.	.40	\$140.00
3/23/2023	Transcribe trial audio to written transcript.	T.H.N.	.70	\$245.00
3/24/2023	Work on Direct of Dave Scott; multiple communications with Dave Scott; communicate with opposing counsel re Monday's hearing; continue to work on method of transcribing hearing recordings.	K.C.E.	2.60	\$1,170.00
3/25/2023	Prepare Dave Scott Direct Examination	K.C.E.	2.50	\$1,125.00
3/27/2023	Prepare for and attend evidentiary hearing (3.5); multiple communications concerning oral argument (.6) ; work on getting unofficial transcript (.6)	K.C.E.	4.70	\$2,115.00
3/28/2023	Analysis of issues identified by Judge Fisher; Begin preparation of Post-hearing brief.	K.C.E.	2.80	\$1,260.00
3/29/2023	Transcribe day 3 evidentiary hearing; update day 1 transcript.	T.H.N.	2.80	\$1,092.00
3/29/2023	Continue developing Post-hearing brief; multiple communications concerning transcript glitches.	K.C.E.	10.50	\$4,725.00
3/30/2023	Continue to work on post-hearing memorandum.	K.C.E.	2.50	\$1,125.00
3/31/2023	Continue to develop post-hearing brief, legal analysis of issues raised by the court at the end of the hearing.	K.C.E.	4.10	\$1,845.00
SUBTOTAL – SERVICES:			228.10	\$92,052.00

COSTS

SUBTOTAL – COSTS: \$0.00

MATTER LEDGER

3/21/2023	Balance before last invoice	\$17,002.50
3/21/2023	Invoice 17634	\$42,242.50
	NEW BALANCE:	\$59,245.00

TRUST ACCOUNT

4/10/2023	Previous Balance	\$0.00
	AVAILABLE IN TRUST:	\$0.00

CURRENT CHARGES: \$92,052.00
PREVIOUS BALANCE DUE: \$59,245.00
BALANCE DUE: \$151,297.00

THANK YOU FOR YOUR BUSINESS!

*We accept the following credit cards: Visa, MasterCard, American Express, Discover & Diner's Club.
Please call (612) 756-7100 to pay by credit card.*

Sapientia Law Group is a women and minority-owned business and has been certified as a minority business enterprise as defined by the National Minority Supplier Development Council and adopted by the Midwest Minority Supplier Development Council. Please contact us for a copy of our certification.



SAPIENTIA
LAW GROUP

120 South 6th Street, Suite 100 | Minneapolis, MN 55402

Phone: (612) 756-7100 | Fax: (612) 756-7101

Tax Identification: 27-5229368

www.sapientialaw.com

PRE-BILL

Prepared for Jeffrey Cates and Christine Cici- Cates

Re: Fee/Employment Applications (10847.08-B08)

Jeffrey Cates and Christine Cici- Cates
2400 Cates Ranch Drive
Hamel, MN 55340

Invoice Number: Pre-bill
Invoice Date: April 04, 2023
Current Charges: \$1,395.00
Balance Due: \$11,520.00

SERVICES

2/20/2023	Prepare final fee application	K.C.E.	3.10	\$1,395.00
SUBTOTAL – SERVICES:				3.10 \$1,395.00

COSTS

SUBTOTAL – COSTS: \$0.00

MATTER LEDGER

8/11/2022	Balance before last invoice	\$7,965.00
12/13/2022	Invoice 17473	\$2,160.00
NEW BALANCE:		\$10,125.00

TRUST ACCOUNT

4/4/2023	Previous Balance	\$0.00
AVAILABLE IN TRUST:		\$0.00

CURRENT CHARGES: \$1,395.00

PREVIOUS BALANCE DUE: \$10,125.00

BALANCE DUE: \$11,520.00

THANK YOU FOR YOUR BUSINESS!

*We accept the following credit cards: Visa, MasterCard, American Express, Discover & Diner's Club.
Please call (612) 756-7100 to pay by credit card.*



SAPIENTIA
LAW GROUP

120 South 6th Street, Suite 100 | Minneapolis, MN 55402

Phone: (612) 756-7100 | Fax: (612) 756-7101

Tax Identification: 27-5229368

www.sapientialaw.com

PRE-BILL

Prepared for Jeffrey Cates and Christine Cici- Cates

Re: Fee/Employment Objection (10847.09-B08)

Jeffrey Cates and Christine Cici- Cates
2400 Cates Ranch Drive
Hamel, MN 55340

Invoice Number: Pre-bill
Invoice Date: April 04, 2023
Current Charges: \$0.00
Balance Due: \$1,395.00

SERVICES

SUBTOTAL – SERVICES:	0.00	\$0.00
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COSTS

SUBTOTAL – COSTS:		\$0.00
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MATTER LEDGER

12/1/2021	Balance before last invoice	\$270.00
3/8/2022	Invoice 17073	\$1,125.00
NEW BALANCE:		\$1,395.00

TRUST ACCOUNT

4/4/2023	Previous Balance	\$0.00
AVAILABLE IN TRUST:		\$0.00

CURRENT CHARGES: \$0.00

PREVIOUS BALANCE DUE: \$1,395.00

BALANCE DUE: \$1,395.00

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PRE-BILL

Prepared for Jeffrey Cates and Christine Cici- Cates

Re: Financing (10847.10-B08)

Jeffrey Cates and Christine Cici- Cates
2400 Cates Ranch Drive
Hamel, MN 55340

Invoice Number: Pre-bill
Invoice Date: April 04, 2023
Current Charges: \$0.00
Balance Due: \$5,355.00

SERVICES

SUBTOTAL – SERVICES:	0.00	\$0.00
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COSTS

SUBTOTAL – COSTS:		\$0.00
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MATTER LEDGER

12/13/2022	Balance before last invoice	\$4,455.00
3/21/2023	Invoice 17637	\$900.00
	NEW BALANCE:	\$5,355.00

TRUST ACCOUNT

4/4/2023	Previous Balance	\$0.00
	AVAILABLE IN TRUST:	\$0.00

CURRENT CHARGES: \$0.00

PREVIOUS BALANCE DUE: \$5,355.00

BALANCE DUE: \$5,355.00

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PRE-BILL

Prepared for Jeffrey Cates and Christine Cici- Cates

Re: Litigation/Contested Matter (10847.11-B08)

Jeffrey Cates and Christine Cici- Cates
2400 Cates Ranch Drive
Hamel, MN 55340

Invoice Number: Pre-bill
Invoice Date: April 04, 2023
Current Charges: \$0.00
Balance Due: \$11,922.50

SERVICES

SUBTOTAL – SERVICES:	0.00	\$0.00
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COSTS

SUBTOTAL – COSTS:		\$0.00
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MATTER LEDGER

12/13/2022	Balance before last invoice	\$11,810.00
3/21/2023	Invoice 17636	\$112.50
NEW BALANCE:		\$11,922.50

TRUST ACCOUNT

4/4/2023	Previous Balance	\$0.00
AVAILABLE IN TRUST:		\$0.00

CURRENT CHARGES: \$0.00

PREVIOUS BALANCE DUE: \$11,922.50

BALANCE DUE: \$11,922.50

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PRE-BILL

Prepared for Jeffrey Cates and Christine Cici- Cates

Re: Costs (10847.13-B08)

Jeffrey Cates and Christine Cici- Cates
2400 Cates Ranch Drive
Hamel, MN 55340

Invoice Number: Pre-bill
Invoice Date: April 04, 2023
Current Charges: \$1,389.80
Balance Due: \$7,916.04

SERVICES

SUBTOTAL – SERVICES:	0.00	\$0.00
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COSTS

2/21/2023	BK Attorney Services - Ref. #7332175646	\$458.64
3/3/2023	Plaza Printing & Copying (Invoice No. 19715)	\$474.11
3/8/2023	BK Attorney Services - Ref. #7332178800	\$39.10
3/9/2023	Plaza Printing & Copying (Invoice No. 19726)	\$401.76
3/21/2023	Target - Bubble Wrap	\$16.19
SUBTOTAL – COSTS:		\$1,389.80

MATTER LEDGER

12/27/2022	Balance before last invoice	\$0.00
3/21/2023	Invoice 17632	\$6,526.24
NEW BALANCE:		\$6,526.24

TRUST ACCOUNT

4/4/2023	Previous Balance	\$0.00
AVAILABLE IN TRUST:		\$0.00

CURRENT CHARGES: \$1,389.80

PREVIOUS BALANCE DUE: \$6,526.24

BALANCE DUE: \$7,916.04

THANK YOU FOR YOUR BUSINESS!

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re: Jeffery Cates and Christine Cici-Cates

Bky File No. 21- 40882 (Chapter 11)

Debtors

CERTIFICATE OF SERVICE

Under penalty of perjury, I declare that on April 10, 2023 in connection with the matter below, the following document(s) were served on the party(s) listed below in the manners indicated:

1. Notice of Hearing and Application for Allowance of Compensation and Reimbursement of Expenses as Attorneys for Debtor on an Interim and Final Basis;
2. Verification;
3. Exhibits;
4. Certificate of service; and
5. Proposed order.

by ECF/EMAIL NOTIFICATION to those Registered Users of the Court's ECF Filing system and that other parties in interest were served by US Mail through certificatesofservice.com who will file their own certificate of service.

Dated: April 10, 2023

/s/ *Kenneth C. Edstrom*

Kenneth C. Edstrom

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re: Jeffery Cates and Christine Cici-Cates

Bky File No. 21- 40882 (Chapter 11)

Debtors

**ORDER FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES AS ATTORNEYS FOR THE DEBTOR**

This case is before the Court on the Application of Sapientia Law Group, for application of fees and costs under Section 327, 330 and 331 of the United States Bankruptcy Code. Based upon on application and the files,

IT IS ORDERED:

1. Applicant Sapientia Law Group is hereby awarded additional fees in the total amount of \$93,627.00.
2. Applicant Sapientia Law Group is hereby awarded additional costs in the total amount of \$1,389.80.
3. The Debtor is authorized to pay Applicant the total amount of \$95,016.80 awarded by this Order.
4. The Court finds that all of the fees and costs awarded were necessary and appropriate and that said fees and costs are approved as final fee awards under 11 USC § 330.
5. As to any party required to be served under Local Rule 9013-3 that was not served in accordance with Federal Rule of Bankruptcy Procedure 7004, the Court deems notice adequate pursuant to Local Rule 9029-1(b).

Dated:

William J. Fisher
United States Bankruptcy Judge